



DATE : September 21, 1979

TO : J. P. Recchi

FROM : C. T. Rockey <sup>original signed by</sup>  
C. T. ROCKEY

SUBJECT : PCB Content - Commercial Subway Transformers

In response to your memorandum of July 30, 1979 we have located and tested oil samples from the ten Westinghouse 26,400 Grd.Y/15,250-480Y/277 Volt Commercial Subway transformers. The results were as follows. There appears to be some correlation between the PCB content and the receiving dates.

City No.	Westinghouse Serial No.	KVA	Receiving Date	PCB Content	Present Location
CS-176	YAV-6579-04	2000	9/27/76	430	Stock
CS-177	YAV 6579-05	2000	9/23/76	750	Stock
CS-180	YAV 6579-06	2000	9/23/76	650	Stock
CS-181	YAV 6579-07	2000	9/27/76	560	Stock
CS-182	YAV 6579-08	2000	10/19/76	170	Stock
CS-183	YAV 6579-09	2000	10/19/76	170	Stock
CS-184	YAV 6584-01	1000	10/22/76	48	Morel Foundry
CS-185	YAV 6584-02	1000	10/22/76	69	Gai's Bakery
CS-186	YAV 6584-03	1000	10/22/76	51	Fred Meyer-Aurora
CS-187	YAV 6584-04	1000	10/22/76	68	Leckenby Steel

We have discussed the results with Environmental Affairs (Mary Savela) and found the following:

1. These transformers were manufactured under the "old" EPA rules which allowed up to 500 ppm to be classified a "non PCB Transformer."
2. New EPA rules now allow up to 50 ppm to be classified "non PCB Transformer"; 50 to 500 ppm to be classified "PCB Contaminated Transformer" and 500 ppm and above are classified "PCB Transformers".
3. The three transformers with PCB contents above 500 ppm (CS-177, CS-180 and CS-181) will be labeled by City Light as a PCB transformer and set aside, not to be installed.
4. The remaining seven transformers will remain unlabeled and City Light will install them as needed.

RECEIVED  
SEP 25 1979

J. P. Recchi  
Page 2  
September 21, 1979

5. A letter will be sent to Westinghouse stating the test results. Since the PCB content of three transformers was above what was required by the EPA at the time of manufacture, we will ask Westinghouse to correct those three units. This letter will be coordinated through Environmental Affairs and the City Attorney.

For your general information, the cost of testing the oil samples was \$85.00 per transformer, not including City Light labor.

JRH:ms

cc: Rockey  
Youngs/Unit 812  
Hayashi/Hickman  
Savela  
Williams, W.  
Henault  
Hunich  
Sickler  
Mandapat  
File

CTY0069443

SEA315857